

TO: Eileen S. Stommes, Deputy Administrator, USDA-AMS-TM-NOP
Room 4007 - So., Ag. Stop 0275
P.O. Box 96456
Washington, DC 20090-6456

Docket Number TMD-94-00-2

Dear Ms. Stommes,

I am writing to inform you that I very much disapprove of the proposed organic standards. "Organic" means food that is not only grown in a sustainable manner, but also involves a way of living on the planet that does not harm. The proposed organic standards will render the term "organic" completely meaningless, and will also eventually put out of business all those farmers which currently embrace the meaning of an organic way of life. In particular:

Section 205.17 Ionized Irradiation: Processing Practices

This practice is not compatible with the processing of organic food. It destroys vitamins, produces carcinogenic compounds, and increases the use of radioactive materials.

Section 205.8 Genetically Engineered Organisms

GEO's should not be allowed in any phase of organic farming, from seed stock to biological controls. Eating organic food is the only way for consumers to avoid this unacceptable practice.

Section 205.22 Municipal Sludge

Sewage sludge should not be allowed in organic farming. Sludge can contain up to 60,000 toxic chemicals, including heavy metals. These toxic chemicals not only affect soil life and beneficial insects, but can be directly absorbed by the plants.

Section 205.15 Livestock Living Conditions

Allowing the factory farming of animals into organic management does not fit the organic method. Animals raised organically should be humanely raised, with access to the outdoors.

Section 205.14 Livestock Health Care

The routine use of antibiotics should not be allowed for organically raised animals.

Section 205.103 Use of Terms Describing Organic Products

The right of free speech ensures U.S. citizens that products reflect the farming conditions. If products are of higher quality, such as "biodynamically grown," then consumers have a right to know.

Organic does not mean: pesticided livestock feed; the use of growth hormones; synthetic and genetically modified food additives and processing aids; toxic "inert" ingredients; and the hazardous pesticide ingredient piperonyl butoxide.

Based on the glaring inadequacies of these proposed standards, I urge you to withdraw the current proposal for the National Organic Standards and resubmit a rule based on the recommendation of the National Organic Standards Board (NOSB). It is illegal for the USDA to add materials to the National List that have not been approved by the NOSB.

Name/

Address
